PELTON & ASSOCIATES PC
Brent E. Pelton
Taylor B. Graham
111 Broadway, Suite 1503
New York, NY 10006
(212) 385-9700

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

JOHN BRIDGELAL and WILKINS BELLIARD, Individually and on Behalf of All Others Similarly Situated, **Plaintiffs,** **-against-** **NY RENAISSANCE CORP., DAN PIRVULESCU and MONIQUE DELACROIX, Jointly and Severally,** **Defendant.**	**No. 15 Civ. 3571 (ADS)(AKT)**

NOTICE OF PLAINTIFFS' MOTION TO DISMISS DEFENDANT'S COUNTERCLAIM

PLEASE TAKE NOTICE, that upon the following memorandum of law, Plaintiffs hereby move this Court for an order dismissing the counterclaims filed by Defendant NY Renaissance Corp. in Defendants' Answer dated September 18, 2015 (Dkt. No. 22).

PLEASE TAKE FURTHER NOTICE, that the motion will be heard at 100 Federal Plaza, Central Islip, New York in the courtroom of the Honorable Arthur D. Spatt, at a time to be set by the Court.

Dated: New York, New York
September 29, 2015

Respectfully submitted,

PELTON & ASSOCIATES PC

By: /s/ *Brent Pelton*

Brent E. Pelton (BP 1055)
Taylor B. Graham (TG 9607)
111 Broadway, Suite 1503
New York, New York 10006
Telephone: (212) 385-9700
Facsimile: (212) 385-0800

Attorneys for Plaintiffs and the putative collective and class